

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JANE DOE,

Plaintiff,

Civil Docket No.:
21CV06792(LLS)

-against-

NOTICE OF MOTION

SOLEBURY SCHOOL, JOHN WARD REGAN, and
JOHN & JANE SMITH 1-20 (FICTIOUS PERSONS
AND/OR ENTITIES),

Defendants.
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PLEASE TAKE NOTICE, that upon the annexed Declaration of Jennifer A. Robinson, an associate of the firm, MARSHALL DENNEHEY WARNER COLEMAN & GOGGIN, attorneys for the Defendant, SOLEBURY SCHOOL (“Solebury”), the exhibits annexed thereto, and upon the pleadings and proceedings had herein, hereby moves this Court, pursuant to Federal Rule of Civil Procedure 12(b)(2) due to lack of personal jurisdiction and pursuant to Federal Rule of Civil Procedure 12(b)(6) for Plaintiff’s failure to state a claim upon which relief can be granted, and for other such relief as this Honorable Court deems just and proper.

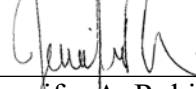
PLEASE TAKE FURTHER NOTICE, Plaintiff’s Opposition is due on or before December 14, 2021, and Defendant’s Reply is due on or before December 21, 2021.

PLEASE TAKE FURTHER NOTICE, that if this motion is denied by the Court, Defendant respectfully requests permission to answer the Complaint within thirty (30) days after service of entry of such Order.

Dated: Purchase, New York
November 30, 2021

Respectfully submitted,

**MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN**



Jennifer A. Robinson, Esq.

Attorneys for Defendant

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TO: **Via Electronic Filing**

SOLOFF & ZERVANOS, P.C.

Jeffrey P. Fritz, Esq.

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